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*Attorneys for Defendants, Corizon Health, Inc., Joseph
McCarthy, MD, Colin Storz, Leslie O'Neil, CJ Buchanan,
Louisa Duru, Molly Johnson, and Courtney Nyman*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

RUSSELL PITKIN and **MARY PITKIN**,
Co-Personal Representatives of the Estate of
MADALINE PITKIN, Deceased,

Plaintiffs,

vs.

CORIZON HEALTH, INC., a Delaware
Corporation; **WASHINGTON COUNTY**, a
government body in the State of Oregon;
JOSEPH MCCARTHY, MD, an
individual; **COLIN STORZ**, an individual;
LESLIE ONEIL, an individual; **CJ**
BUCHANAN, an individual; **LOUISA**
DURU, an individual; **MOLLY**
JOHNSON, an individual; **COURTNEY**
NYMAN, an individual,

Defendants.

Case No. 3:16-cv-02235-AA

**DECLARATION OF RICHARD K.
HANSEN IN SUPPORT OF INDIVIDUAL
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT
AND CORIZON HEALTH, INC.'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

I, Richard K. Hansen, hereby declare as follows:

1. I am one of the attorneys of record for Defendants Corizon Health, Inc., Joseph McCarthy, MD, Colin Storz, Leslie O'Neil, CJ Buchanan, Louisa Duru, Molly Johnson, and Courtney Nyman in the above-captioned action. I make this declaration in support of Individual Defendants' Motion for Summary Judgment.

2. Exhibit 1 is a true and accurate copy of relevant excerpts from the deposition of Molly Johnson, taken on April 27, 2017.

3. Exhibit 2 is a true and accurate copy of relevant excerpts from the deposition of C.J. Buchanan, taken on August 15, 2017.

4. Exhibit 3 is a true and accurate copy of relevant excerpts from the deposition of Deputy Ken Mitchell, taken on August 14, 2017.

5. Exhibit 4 is a true and accurate copy of relevant excerpts from the deposition of Matthew Northup, taken on April 30, 2018.

6. Exhibit 5 is a true and accurate copy of relevant excerpts from the deposition of Colin Storz, PA, taken on April 26, 2017.

7. Exhibit 6 is a true and accurate copy of relevant excerpts from the deposition of Dr. Joseph McCarthy, taken on June 27, 2017.

8. Exhibit 7 is a true and accurate copy of relevant excerpts from the deposition of Evangeline Nichols, taken on June 12, 2017.

9. Exhibit 8 is a true and accurate copy of relevant excerpts from the deposition of Courtney Nyman, taken on June 12, 2017.

10. Exhibit 9 is a true and accurate copy of relevant excerpts from the deposition of Deputy Richard Thompson, taken on August 16, 2017.

11. Exhibit 10 is a true and accurate copy of relevant excerpts from the deposition of Leslie O'Neil, taken on April 27, 2017.

12. Exhibit 11 is a true and accurate copy of relevant excerpts from the deposition of Nerissa Galvez, taken on June 27, 2017.

13. Exhibit 12 is a true and accurate copy of relevant excerpts from the deposition of Louisa Duru, taken on October 2, 2017.

14. Exhibit 13 is a true and accurate copy of relevant excerpts from the deposition of Tony Wertz, taken on October, 2017.

15. Exhibit 14 is a true and accurate copy of relevant excerpts from the deposition of Mandy Forsmann, taken on January 23, 2018.

16. Exhibit 15 is a true and accurate copy of relevant excerpts of Corizon's medical file of Madaline Pitkin, Bates numbered CORIZON000002; CORIZON000004-10; CORIZON000012-17; CORIZON000019-21; and CORIZON000023.

17. Exhibit 16 is a true and accurate copy of relevant excerpts of Washington's County Sheriff's Office file of Madaline Pitkin, Bates numbered CORIZON000040; and, CORIZON000047.

18. Exhibit 17 is a true and accurate copy of excerpts of the Professional Services Contract between Washington County and Prison Health Services, Inc., Bates numbered CORIZON000367.

19. Exhibit 18 is a true and accurate copy of relevant excerpts of contract between Corizon Health, Inc. and Washington County, dated June 18, 2013, Bates numbered CORIZON000399-402.

20. Exhibit 19 is a true and accurate copy of Prison Health Services Inc.'s staffing pattern, Bates numbered CORIZON000406.

21. Exhibit 20 is a true and accurate copy of letter from Mandy Forsmann to Colin Storz, PA, dated June 27, 2014, Bates numbered CORIZON001203.

22. Exhibit 21 is a true and accurate copy of letter from Nancy James to Colin Storz, PA, dated March 14, 2014, Bates numbered CORIZON001307-1309.

23. Exhibit 22 is a true and accurate copy of PA Colin Storz' Job Description, Bates numbered CORIZON001221-1222.

24. Exhibit 23 is a true and accurate copy of relevant excerpts of Tualatin Police Department's Special Report by Investigator K. Winfield, Bates numbered WC001606-1607; and, WC001819.

25. Exhibit 24 is a true and accurate copy of excerpt of expert report of Steven R. Shelton, MD, CCHP-A, CCHP-P, FACCP, dated July 2, 2018.

26. Exhibit 25 is a true and accurate copy of excerpt of expert report of Domenic Sica, M.D.

27. Exhibit 26 is a true and accurate copy of except of expert report of Carl Wigren.

28. Exhibit 27 is a true and accurate copy of excerpt of rebuttal expert report of Carl Wigren, dated August 1, 2018.

29. Exhibit 28 is a true and accurate copy of excerpts of expert report of Nathaniel Moore, M.D., dated July 31, 2018.

30. Exhibit 29 is a true and accurate copy of excerpts of the expert report of Linda Bernard, RN, LNC, CCHP-RN, dated July 2, 2018.

31. Exhibit 30 is a true and accurate copy of excerpts from the Oregon State Medical Examiner's Report, Bates numbered, CORIZON000026-27; and, CORIZON000036.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on this 3rd day of October, 2018.

/s/Richard K. Hansen
Richard K. Hansen, OSB #832231

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of October, 2018, I served the foregoing
DECLARATION OF RICHARD K. HANSEN IN SUPPORT OF INDIVIDUAL
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND CORIZON HEALTH,
INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT on the following parties:

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by:

<input type="checkbox"/>	U.S. Postal Service, ordinary first class mail
<input type="checkbox"/>	U.S. Postal Service, certified or registered mail,
<input type="checkbox"/>	return receipt requested
<input type="checkbox"/>	hand delivery
<input type="checkbox"/>	facsimile
<input checked="" type="checkbox"/>	CM/ECF electronic service
<input type="checkbox"/>	other (specify) <u>Email</u>

/s/Richard K. Hansen
Richard K. Hansen